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Attorneys for plaintiff,  
Doctor's Financial Network, Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Doctor's Financial Network, Inc., a  
California corporation,

Plaintiff,

v.

DrDisabilityQuotes.com, LLC, a New  
Jersey limited liability company,

Defendant.

DrDisabilityQuotes.com, LLC, a New  
Jersey limited liability company,

Counterclaimant and  
Third-Party Plaintiff

v.

Doctor's Financial Network, Inc., a  
California corporation,

Counterclaim Defendant;

and

Charles Krugh, an individual,

Third-party Defendant.

**Civil Case No. 2:22-cv-02149**

**PLAINTIFF DOCTOR'S FINANCIAL  
NETWORK, INC. AND THIRD-PARTY  
DEFENDANT CHARLES KRUGH'S  
NOTICE OF MOTION AND MOTION TO  
FILE UNDER SEAL**

Pursuant to Local Civ. Rule 5.3, Plaintiff Doctor's Financial Network, Inc. and Third-party Defendant Charles Krugh hereby move to conditionally file under seal Exhibits ("Exhibits") to the Declaration of Gordon E. Gray in opposition to Defendant DrDisabilityQuotes.com, LLC's Motion for Summary Judgment.

The Exhibits contain, discuss, or otherwise include information that Defendant DrDisabilityQuotes.com, LLC designated "Confidential," and "Attorneys' Eyes Only," pursuant to the Discovery Protective Order dated August 23, 2022 ("Protective Order") (Dkt. # 25).

This information purportedly constitutes protected Material as defined in §3(A) of the Protective Order. The exhibits will be lodged with the Court and served on Defendant to provide it with an opportunity to support its claim of confidentiality. For this reason , Plaintiff Doctor's Financial Network, Inc. and Third-party Defendant Charles Krug respectfully requests that the Court conditionally seal the exhibits.

An Index of the Exhibits is provided as follows:

<b>Material</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>	<b>Why a Less Restrictive Alternative to the Relief Sought is Not Available</b>	<b>Party in Opposition to Sealing, if any, and Basis</b>
Graham Rogers Deposition and Exhibits	Protective Order (Dkt. #25)	Designated by Non-moving party pursuant to Protective Order	Designated by Non-moving party pursuant to Protective Order	None.
Plaintiff's Expert Report of David Nolte and Exhibits	Protective Order (Dkt. #25)	Designated by Non-moving party pursuant to Protective Order	Designated by Non-moving party pursuant to Protective Order	None.
Excerpts and Exhibits 117-122 from Deposition Transcript of Bob Bhayani (DDQ)	Protective Order (Dkt. #25)	Designated by Non-moving party pursuant to Protective Order	Designated by Non-moving party pursuant to Protective Order	None.
Supplemental Interrogatory Response No. 15 of DrDisabilityQuotes.com, LLC	Protective Order (Dkt. #25)	Designated by Non-moving party pursuant to Protective Order	Designated by Non-moving party pursuant to Protective Order	None.

Respectfully submitted,

**Law Offices of Peter J. Lamont**

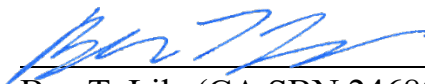
Dated: June 7, 2024

/s/ Peter J. Lamont

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**Mandour & Associates, APC**

Dated: June 7, 2024



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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the below, copies of the foregoing document was filed electronically via the Court's CM/ECF system. Notice of these filings will be sent to all attorneys of record by operation of the Court's Electronic Filing System.

Dated: June 7, 2024

**Law Offices of Peter J. Lamont**

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